



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET N.E.
ATLANTA, GEORGIA 30365

SUBJECT: Olin Corporation/McIntosh Plant
Revised RI/FS Sampling and Analysis Plan
EPA I.D. No. ALD 008 188 708
Superfund Account No. TGB04D6B6

FROM: Lael H. Butler, Hydrogeologist
AL/MS Unit, RCRA Permitting Section

TO: Cheryl W. Smith, RPM
South Superfund Remedial Branch

THRU: Beverly F. Williams, Chief
AL/MS Unit, RCRA Permitting Section

A review of the revised RI/FS Sampling and Analysis Plan (SAP) has been completed. The following are my comments:

- Page 1, Section 1.0 Introduction, last ¶: This paragraph is unclear. Does Olin monitor other permitted hazardous waste facilities or does Olin have numerous permits for this facility? Please clarify.
- Page 4, Section 1.2 Revised Sampling and Analysis Plan Scope, Clean Closure Equivalency: The text states that five of the formerly clean-closed SWMUs (4 surface impoundments and one waste pile - SWMU names were not included) are subject to additional sampling to comply with 40 CFR 271.(c) (clean closure equivalency). Page 13, Section 2.1.2 Clean Closure Equivalency, lists only four (Stormwater Pond, Brine Filter Backwash Pond, Pollution Abatement (pH) Pond, and the Mercury Waste Pile Storage Pad) SWMUs subject to clean closure equivalency standards. Please clarify.
- Page 7, Section 2.1.1 SWMU and AOCs Designated for Sampling, Footnote: It is recommended that samples be collected at the visually stained/unstained interface for confirmation.
- Page 39, Section 4.1.4 Old Plant Landfill Drainage Ditch: The text states that 2 composite soil samples will be collected from one boring. Table 6, Summary of Sampling Activities, lists only one composite soil sample to be collected and analyzed. Please clarify.
- Page 41, Section 4.1.6 Mercury Cell Plant: It is recommended that the composite soil samples be analyzed for TCLP and Total mercury.
- Page 42, Section 4.1.8 Strong Brine Pond: Since mercury is the potential constituent of concern, it is recommended that the soil samples be analyzed for TCLP and Total mercury.

Should you have any questions, please contact me at x3433.